OOCKET COLOR

ORIGINAL

Lance J.M. Steinhart, P.C.

Attorney At Law 1720 Windward Concourse Suite 250 Alpharetta, Georgia 30005 RECEIVED & INSPECTED

NOV 7 2006

FCC - MAILROOM

Also Admitted in New York and Maryland

Telephone: (770) 232-9200 Facsimile: (770) 232-9208

November 1, 2006

### **VIA OVERNIGHT DELIVERY**

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554
Attention: Chief, Pricing Policy Division, Wireline Competition Bureau

Re:

CC Docket No. 94-129

Drop-Off Exemption Certification for Multiline Long Distance, Inc.

Dear Ms. Dortch:

Enclosed please find for filing Multiline Long Distance, Inc.'s Drop-Off Exemption Certification.

Please date-stamp the extra copy of this letter and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding the foregoing, please do not hesitate to call me. Thank you.

Respectfully submitted,

Angela Janssen, Legal Assistant to

Lance J.M. Steinhart

Autorney for Multiline Long Distance, Inc.

Enclosures

cc:

Everard Kidder Meade III

### Multiline Long Distance, Inc. 8044 Montgomery Road, Suite 700 Cincinnati, Ohio 45236

October 11, 2006

# RECEIVED & INSPECTED NOV 7 2006 FCC - MAIL ROOM

#### **VIA OVERNIGHT DELIVERY**

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Attention: Chief, Pricing Policy Division, Wireline Competition Bureau

Re: CC Docket No. 94-129

Drop-Off Exemption Certification for Multiline Long Distance, Inc.

Dear Ms. Dortch:

In its Third Order on Reconsideration and Second Further Notice of Proposed Rulemaking, released March 17, 2003 ("Order"), the Federal Communication Commission partially overturned its requirement that a carrier's sales agent must drop-off a sales call once the sales agent has initiated independent third-party verification using a three-way conference call. Under prior FCC rules, for sales that are verified through a three-way conference call or a call through an automated verification system, a carrier's sales agent must drop off the call once the three-way connection has been established. In the Order, the FCC created an exemption to the "drop-off" rule for any carrier that certifies to the FCC that their sales agents are unable to drop off the sales call after initiating a third party verification.

Please accept this letter as the company's certification that its sales agents are unable to drop off the sales call after initiating a third party verification. The sales agents are unable to drop off the sales call because compliance is not feasible since the company lacks the technical means to comply with the requirement.

I, Everard Kidder Meade III, President of Multiline Long Distance, Inc., pursuant to 28 U.S.C. § 1746, declare that the foregoing is true and correct, under penalty of perjury.

Signed this 18th day of October 2006.

Multiline Long Distance, Inc.

Everard Kidder Meade III, President





445 Hamilton Avenue - Suite # 408 White Plains, New York 10601

> Fax: 914-948-5550 Fax: 914-948-5999

DOCKET FILE COPY ORIGINAL

RECEIVED & INSPECTED

NOV 7 2006

FCC - MAILROOM

November 2, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re:

CordiaIP Corp.

FRN: 0014066526

ET Docket 04-295; FCC 06-56

Dear Ms. Dortch:

Enclosed for filing is the Policies and Procedure System Security Manual on behalf of the above referenced entity. Please feel free to contact me if you require any additional information.

Respectfully submitted,

Maria Al Abbagha General Counsel

14-948-3550 x1054



and a me welling

Telephone: 914-948-5550

RECEIVED & INSPECTED

NOV 7 2006

FCC - MAILROOM

CordiaIP Corp.
Policies & Procedure
System Security Manual

To ensure that only lawful interceptions occur on premises, CordiaIP Corp. ("CIP") will not enable law enforcement officials and CIP personnel to intercept communications or grant access to Call Identifying Information (CII), unless it receives the appropriate authorization which is comprised of *both* legal authorization and appropriate carrier authorization.

Appropriate legal authorization is a court order executed by a judge or magistrate authorizing or approving of the interception of wire or electronic communication or other authorization pursuant to 18 USC 2518(7), which governs interception by law enforcement without court authorization based upon the enumeration of exigent circumstances and only if court authorization is sought within forty-eight (48) hours after the interception occurs.

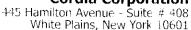
Appropriate carrier authorization are the policies and procedures adopted by CIP to supervise and control its officers and employees authorized to assist law enforcement in conducting any interception of communications or access to call-identifying information.

CIP's process is as follows:

- 1. receipt of request for CII or access to intercept communications
- 2. forwarded to legal department for review
- 3. legal department approves/denies request
- 4. requested information is extracted to law enforcement agency requesting the CII or access to intercept communications

CIP will maintain a record of each interception or access for at least a two (2) year period. In addition, CIP shall report to affected law enforcement agencies, within a reasonable time upon discovery of the following:

- 1. any act of compromise of a lawful interception of communications or access to CII to unauthorized persons or entities; and
- 2. any act of unlawful electronic surveillance that occurred on our premises.





o for use or colling.

## Appendix 1 Designation of Point of Contact

Telephone: 914-948-5550 Fax: 914-948-5999

CordiaIP Corp.
Policies & Procedure
System Security Manual

CIP designates its Maria A. Abbagnaro, General Counsel as the designated point of contact for ensuring that any interception of communications can be activated only in accordance with a court order or other lawful authorization. Ms. Abbagnaro may be reached at 914-948-5550 x1054.

CIP designates Joshua Foster, Director of Network Operations shall be responsible for granting access to CII effected within its switching premises after it has been determined that the interception/CII request is lawful. Mr. Foster may be reached at 407-313-7000 x 3202, twenty-four (24) hours a day, seven (7) days a week.